

**REMARKS**

Claims 1-3 and 7-30 are pending in this application. Although the Office Action indicates that claims 4-6 are pending, these claims were previously canceled. By this Amendment, claims 1, 11, 14, 16, and 22 are amended. Support for the amendments can be found in the specification at, for example, page 27, paragraph 0083. No new matter is added. Reconsideration of the application based upon the above amendments and the following remarks is respectfully requested.

The courtesies extended to Applicants' representative by Examiner Daniels at the interview held December 21, 2007 are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicants' record of the interview.

Entry of the amendments and attached Declaration is proper under 37 CFR §1.116 because the amendments and Declaration: (a) place the application in condition for allowance (for the reasons discussed herein); (b) do not raise any new issue requiring further search and/or consideration (as the amendments amplify issues previously discussed throughout prosecution); (c) satisfy a requirement of form asserted in the previous Office Action; (d) do not present any additional claims without canceling a corresponding number of finally rejected claims; and (e) place the application in better form for appeal, should an appeal be necessary. The amendments and attached Declaration are necessary and were not earlier presented because they are made in response to arguments raised during the interview held December 21, 2007. Entry of the amendments is thus respectfully requested.

**I. Rejections Under 35 U.S.C. §103**

Claims 1, 2, 7-9, 11-14, 16-20, 22, 23, 29, and 30 are rejected under 35 U.S.C. §103(a) as unpatentable over Foltz *et al.* ("Foltz") in view of Taniishi *et al.* ("Taniishi"). Claims 3, 24 and 25 are rejected under 35 U.S.C. §103(a) as unpatentable over Foltz in view

of Taniishi and in further view of Yu *et al.* ("Yu"). Claim 15 is rejected under 35 U.S.C. §103(a) as unpatentable over Foltz in view of Taniishi and in further view of Wellenhofer. Claims 26-28 are rejected under 35 U.S.C. §103(a) as unpatentable over Foltz in view of Taniishi and in further view of Yu and Wellenhofer. Because the rejections are related they are addressed together. Applicants respectfully traverse the rejections.

Each of independent claims 1 and 16 specify, *inter alia*, that the stress/strain relief process for a flexible, multilayered web stock includes passing the multilayered web stock at a continuous speed over and in contact with a first concave or reversed-crown wrinkle-reducing roller. Each of the cited references fails to teach or suggest that the web stock moves at a continuous speed during the stress/strain relief process, and thus fails to have rendered obvious the claimed invention.

As explained in the attached Declaration, Foltz describes a batch heat treatment annealing process used in the initial manufacturing of imaging member belt materials. In Foltz, the imaging member web is parked over the processing tube in such a manner that the imaging member web makes contact with the outer surface of the processing tube over an angular bending range between the points a and b (Foltz, col. 10, lines 1-17). The processing tube heats and then cools the imaging member web, between the points a and b, while it is stopped in the parked state over the processing tube (Foltz, col. 10, lines 38-51). Once the imaging member web is cooled it is advanced, by a distance equal to the distance between points a and b, and the next segment is subjected to the same heating and cooling process (Foltz, col. 11, lines 48-55).

Foltz's method is a stop and go batch heat-treatment process. Thus, Foltz does not teach or suggest a stress/strain relief process for a flexible, multilayered web stock that includes passing the web stock, at a continuous speed, over and in contact with a first concave or reversed-crown wrinkle-reducing roller, as claimed.

The continuous heat treatment process of the claimed invention is a significant improvement over Foltz's batch heat treatment process. Foltz's batch heat treatment process reintroduces internal web and cross-web directional stress and strain into the charge transport layer. As further explained in the attached Declaration, the continuous heat treatment process of the claimed invention is a significant improvement over Foltz's batch process because it prevents the reintroduction of internal web and cross-web directional stress and strain into the charge transport layer while also reducing the imaging member production throughput time it takes to process the desired length of web stock.

Taniishi discloses a process to fabricate a concave roller to be used in an apparatus that fixes a toner image onto a paper substrate in an electrophotographic imaging apparatus; it does not relate to the heat treatment of imaging member web stock (Taniishi, col. 1, lines 7-16). The apparatus is a dual roller system that consists of a concave roller that is used to press a toner image onto a carrying paper substrate by pressing it against a heated solid rigid roller (Taniishi, col. 1, lines 10-20). Taniishi's concave roller is composed of a metal core that is covered with a thick, flexible silicone rubber layer (Taniishi, col. 1, lines 45-50). The silicone rubber layer is used to generate a linear force in the transverse direction of the paper substrate, which stretches the paper substrate from the center toward its lateral edges (Tanishi, col. 1, lines 32-40). The paper substrate is stretched as it passes through the dual roller apparatus so that wrinkles are not formed on the paper substrate that would degenerate the quality of the toner image (Taniishi, col. 1, lines 20-30). The silicone rubber layer is also useful for preventing the offsetting of the toner (Taniishi, col. 1, lines 45-50).

The present disclosure describes passing the electrophotographic imaging member web stock over a selected roller during the heat-treating process to substantially eliminate the internal tension strain caused by the charge transport layer material matrix. The selected roller is used to create a spontaneous transverse tension that expands the member in a

direction perpendicular to the direction in which the web stock is traveling, while it is under a required web directional tension, immediately prior to making contact with the heat treatment tube. The transverse tension expands the web stock from the center towards its lateral edges to prevent micro ripple formation induced by the heat stress release treatment tube to thereby provide a significantly improved annealing treatment. Therefore, the selected roller of the present disclosure is used in a completely different process and under different operational conditions than Taniishi's concave roller. The attached Declaration further explains the differences between Taniishi's concave roller and the selected roller of the claimed invention.

Thus, Taniishi does not teach or suggest a stress/strain relief process for a flexible, multilayered web stock that includes passing the web stock, at a continuous speed, over and in contact with a first concave or reversed-crown wrinkle-reducing roller, as claimed.

Yu, cited only against dependent claims 2 and 24-28, does not teach or suggest a stress/strain relief process for a flexible, multilayered web stock that includes passing the web stock, at a continuous speed, over and in contact with a first concave or reversed-crown wrinkle-reducing roller. Therefore, Yu does not overcome the deficiencies of Foltz and Taniishi, as discussed above.

Wellenhofer, cited only against dependent claims 15 and 26-28, does not teach or suggest a stress/strain relief process for a flexible, multilayered web stock that includes passing the web stock, at a continuous speed, over and in contact with a first concave or reversed-crown wrinkle-reducing roller. Therefore, Wellenhofer does not overcome the deficiencies of Foltz and Taniishi, as discussed above.

Claims 2, 3, 7-9, 11-15, 17-20, and 22-30 variously depend from independent claims 1 and 16. Because Foltz, Taniishi, Yu and Wellenhofer fail to teach or suggest, alone or in combination, the features recited in independent claims 1 and 16, dependent claims 2-9, 11-15, 17-20, and 22-30 are patentable for at least the reasons that claims 1 and 16 are

patentable, as well as for the additional features they recite.

Accordingly, any combination of the cited references fails to teach or suggest a stress/strain relief process for a flexible, multilayered web stock that includes passing the web stock, at a continuous speed, over and in contact with a first concave or reversed-crown wrinkle-reducing roller, as claimed. The references thus would not have rendered obvious the claimed invention. Accordingly, reconsideration and withdrawal of the rejections are respectfully requested.

## **II. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of this application are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

  
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